## **Substantial Compliance Determination**

Permittee Name: Superior Refining Company		Permit Number: 0003085-09-0
LLC		
	Compliance?	Comments
Discharge Limits	Yes	
Sampling/testing requirements	Yes	
Groundwater standards	NA	
Reporting requirements	Yes	
Compliance schedules	Yes	
Management plan	Yes	
Other:	NA	
Enforcement Considerations	None	
In substantial compliance?	Yes	
	Comments: Completed a limited compliance inspection on June 14, 2019. Since the refinery incident in April 2018, the refinery has not been refining product and the WWTP has been operating in a limited fashion; initially operating to treat products as the refinery was deinventorying and decommissioning equipment, and cleaning up after the incident. At the time of this inspection, only treating flows from boiler blowdown, softener reject, and stormwater. Often there is not enough "inventory" to treat and discharge, in which case the treated effluent is recirculated back to the headworks with zero discharge in order to maintain flow through the plant. GAC and ion exchange resin have been added to the treatment process to target PFAS compounds from fire fighting products. The WWTP has been meeting all limits in the permit. When refinery operations resume, the refinery will discharge pretreated wastewater to the City of Superior WWTP as an industrial discharger regulated by the City's pretreatment authority.  Signature: Eric DeVenecia Date: 9/6/19	